

Kami E. Quinn
Gilbert LLP
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<i>In re:</i>	:	
	:	
	:	Chapter 11
PURDUE PHARMA L.P., <i>et al.</i> ,	:	
	:	Case No. 19-23649 (RDD)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	

**THIRTY-EIGHTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	November 1, 2022 through November 30, 2022
Amount of compensation sought as actual, reasonable, and necessary:	\$387,224.40 (80% of \$484,030.50)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$21,069.77(100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this thirty-eighth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing November 1, 2022 through November 30, 2022 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$484,030.50 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$387,224.40.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$745.24. The blended hourly rate of paraprofessionals during the Application Period is \$289.47.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$14,607.27 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$14,607.27.

4. Annexed hereto as **Exhibit D** is the summary of reasonable and necessary expenses incurred by Gilbert LLP for retained consulting experts, which have not yet been paid. Pursuant to the retention agreements applicable to these consulting experts, Gilbert LLP is not obligated to actually pay the incurred amounts until those expenses have been approved pursuant to the process mandated by the Procedures Order. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks payment for 100% of such expenses, totaling \$6,462.50. Upon receipt, Gilbert LLP will promptly pay the accrued expenses that are approved.

5. Annexed hereto as **Exhibit E** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

[THE REMAINDER OF THIS PAGE IS INTENTIONAL BLANK]

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$387,224.40 (80% of \$484,030.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$21,069.77 (100%), for a total amount of \$408,294.17 for the Application Period.

Dated: January 13, 2023
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

Kami E. Quinn
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A004	Case Administration	3.1	\$620.00
A006	Employment / Fee Application	0.8	\$680.00
A015	Non-Working Travel (Billed @ 50%)	48.5	\$22,877.50
A020	Insurance Adversary Proceeding	655.5	\$459,853.00
		707.9	\$484,030.50

Exhibit B

Summary of Compensation by Professional

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate ²	Hours Billed for Period	Total Fees for Period
Richard Leveridge	Partner / State of New York – 1997 District of Columbia – 1981 U.S. Court of Appeals for the District of Columbia – 1981 U.S. District Court for the District of Columbia – 1982 U.S. Supreme Court - 1986 U.S. Court of Appeals for the Fourth Circuit - 1988 U.S. District Court for the Eastern District of New York – 1988 U.S. District Court for the Southern District of New York - 1998 U.S. District Court for the District of Maryland – 2000 U.S. Court of Appeals for the Second Circuit - 2020	\$1,450 \$725	64.8 12.2	\$93,960.00 \$8,845.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,450	15.5	\$22,475.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$850 \$425	100.8 17.7	\$85,680.00 \$7,522.50
Jon Dougherty	Of Counsel / State of New York – 2014 U.S. District Court for the Southern District of New York – 2014 District of Columbia – 2016 U.S. District Court for District of Wisconsin – 2017 U.S. Bankruptcy Court for the Southern District of New York - 2022	\$720	53.5	\$38,520.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$700 \$350	94.1 18.6	\$65,870.00 \$6,510.00
Adam Farra	Associate / State of Maryland – 2011 U.S. District Court for the District of Maryland – 2013 District of Columbia – 2015 U.S. Court of Appeals for the Second Circuit - 2017	\$710	6.8	\$4,828.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$660	32.8	\$21,648.00
Alison Gaske	Associate / District of Columbia – 2016	\$610	55.3	\$33,733.00
Ethan Kaminsky	Associate / State of New York – 2018 U.S. Court of Appeals for the Second Circuit – 2018 U.S. District Court for the Southern District of New York - 2019 Second Circuit Court of Appeals – 2020	\$560	18.1	\$10,136.00

² Non-working travel is billed @ 50% of regular hourly rate.

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate²	Hours Billed for Period	Total Fees for Period
Janet Sanchez	Associate / Commonwealth of Virginia – 2020 District of Columbia - 2022	\$475	11.9	\$5,652.50
Ifenanya Agwu	Associate / District of Columbia – 2022	\$475 ³	62.6	\$29,735.00
December Huddleston	Associate / District of Columbia – 2021	\$475 ³	35.1	\$16,672.50
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365	12.6	\$4,599.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425	6.4	\$2,720.00
Alyssa Bonesteel	eDiscovery & Policy Review Coordinator– Joined firm in 2018	\$375	4.7	\$1,762.50
Sherley Martinez	Paralegal – Joined firm in 2017	\$325	4.6	\$1,495.00
Nick Poz	Paralegal – Joined firm in 2022	\$325	35.7	\$11,602.50
Sara Ogrey	Paralegal – Joined firm in 2019	\$240	31.1	\$7,464.00
Carmen Turner	Junior Paralegal – Joined firm in 2021	\$200	13.0	\$2,600.00
	Totals		707.9	\$484,030.50
	Attorney Blended Rate	\$745.24		
	Paraprofessional Blended Rate	\$289.47		

³ The rate change is due to promotion effective as of October 1, 2022.

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Contracted Professional Fees – Litigation Support Vendors	\$1,142.82
Depositions / Transcripts	\$7,048.60
Messenger & Delivery	\$417.88
Travel – Lodging	\$2,809.37
Travel – Meals	518.47
Travel – Mileage	\$313.13
Travel – Parking	\$195.00
Travel – Taxi Fare	\$70.00
Travel – Train Fare	\$2,092.00
Total	\$14,607.27

Exhibit D

Summary of Expenses Incurred and Not Yet Paid

SUMMARY OF EXPENSES INCURRED BUT NOT YET PAID

DESCRIPTION	Total Expenses for Period
Insurance Consulting Expert A	\$6,462.50
Total	\$6,462.50

Exhibit E

Time and Expense Detail



700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
O 202.772.2200
F 202.772.3333
GilbertLegal.com

Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

January 4, 2023
Invoice Number: 11328894
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through November 30, 2022

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	484,030.50	14,607.27	498,637.77
Total	484,030.50	14,607.27	498,637.77
TOTAL FEES			\$ 484,030.50
TOTAL EXPENSES			<u>\$ 14,607.27</u>
TOTAL FEES AND EXPENSES			\$ 498,637.77

FOR PROFESSIONAL SERVICES RENDERED through November 30, 2022

Purdue Bankruptcy

A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	11/01/22	Review court docket for insurance-related pleadings recently filed in case.	.80	160.00
Turner, C.	11/07/22	Review court docket for pleadings recently filed in adversary proceeding.	1.00	200.00
Turner, C.	11/10/22	Review and organize case-related pleadings.	.60	120.00
Turner, C.	11/28/22	Review court docket for pleadings recently filed in case.	.70	140.00
Project Total:			3.10	\$ 620.00

A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Rubinstein, J.	11/16/22	Participate in hearing re fee applications.	.80	680.00
Project Total:			.80	\$ 680.00

A015: Non-Working Travel (Billed @ 50%)

Name	Date	Services	Hours	Amount
Rubinstein, J.	11/01/22	Travel from Washington, DC to Stamford, CT for deposition preparation meeting.	5.00	2,125.00
Leveridge, R.	11/01/22	Travel from Washington, DC to Stamford, CT for deposition preparation.	1.80	1,305.00
Rubinstein, J.	11/02/22	Travel from Stamford, CT to Potomac, MD.	2.80	1,190.00
Leveridge, R.	11/03/22	Travel from Stamford, CT to Washington, DC.	2.40	1,740.00
Rubinstein, J.	11/08/22	Travel from Washington, DC to Pittsburgh, PA for deposition.	5.00	2,125.00
Rush, M.	11/08/22	Travel from Maryland to Pittsburgh, PA for deposition.	4.50	1,575.00
Rubinstein, J.	11/09/22	Travel from Pittsburgh, PA to Washington, DC.	4.90	2,082.50
Rush, M.	11/09/22	Travel from Pittsburgh, PA to Maryland after deposition.	5.10	1,785.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Rush, M.	11/13/22	Travel from Maryland to New York, NY for deposition.	4.50	1,575.00
Leveridge, R.	11/13/22	Travel from Washington, DC to New York, NY for deposition.	4.00	2,900.00
Rush, M.	11/14/22	Travel from New York, NY to Maryland after deposition.	4.50	1,575.00
Leveridge, R.	11/14/22	Travel from New York, NY to Washington, DC after deposition.	4.00	2,900.00
Project Total:			48.50	\$ 22,877.50

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Shore, R.	11/01/22	Confer with E. Kaminsky re Issue #51.	.50	725.00
Rubinstein, J.	11/01/22	Confer with R. Leveridge re strategy (0.2); confer with S. Sraders re open projects (0.3); continue review of documents for Consulting Expert A (0.1); review documents in preparation for deposition preparation meeting with Deponent #7 (1.9); correspond with co-counsel re underlying claims (0.3).	2.80	2,380.00
Rush, M.	11/01/22	Draft outlines for depositions re Insurer #25.	4.50	3,150.00
Martinez, S.	11/01/22	Review discovery requests and responses tracking sheet.	.10	32.50
Martinez, S.	11/01/22	Review historic agreements per A. Gaske.	.40	130.00
Gaske, A.	11/01/22	Correspond with S. Martinez re search for certain agreements.	.20	122.00
Leveridge, R.	11/01/22	Review materials and outline in preparation for deposition of Deponent #7 (4.2); confer with J. Rubinstein re strategy (0.2).	4.40	6,380.00
Farra, A.	11/01/22	Research re contention interrogatory responses.	3.00	2,130.00
Sraders, S.	11/01/22	Confer with J. Rubinstein re upcoming depositions and expert work.	.30	198.00
Sraders, S.	11/01/22	Confer with J. Dougherty re upcoming deposition of Deponent #3.	.40	264.00
Sraders, S.	11/01/22	Revise deposition outline for Deponent #3.	.90	594.00
Kaminsky, E.	11/01/22	Confer with R. Shore re Issue #51 legal research.	.50	280.00
Kaminsky, E.	11/01/22	Research Issue #51.	1.30	728.00
Huddleston, D.	11/01/22	Research Issue #33.	3.30	1,567.50
Agwu, I.	11/01/22	Research Issue #14.	3.00	1,425.00
Agwu, I.	11/01/22	Research Issue #38.	4.00	1,900.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Poz, N.	11/01/22	Research additional documents re preparation for Deponent #7 deposition.	.60	195.00
Poz, N.	11/01/22	Organize updated records for review in preparation for Deponents #1 and #2 depositions.	1.10	357.50
Dougherty, J.	11/01/22	Confer with S. Sraders re preparations for deposition of Deponent #3.	.40	288.00
Dougherty, J.	11/01/22	Review draft deposition outline and cited documents for Deponent #3 deposition.	2.80	2,016.00
Shore, R.	11/02/22	Participate in Deponent #7 deposition preparation (partial).	1.00	1,450.00
Rubinstein, J.	11/02/22	Communicate with R. Leveridge and M. Rush re Insurer #25 deposition preparation (0.4); participate in preparation meeting re Deponent #7 deposition (5.8); confer with co-counsel re same and litigation strategy (1.0); revise Insurer #25 deposition outline (2.5).	9.70	8,245.00
Rush, M.	11/02/22	Communicate with R. Shore, R. Leveridge and J. Rubinstein re strategy for insurer depositions.	.50	350.00
Rush, M.	11/02/22	Review Insurer #25 correspondence (0.5); draft letter re document collection efforts (1.6).	2.10	1,470.00
Rush, M.	11/02/22	Revise letter to insurers re Rule 30(b)(6) meet-and-confer.	1.60	1,120.00
Martinez, S.	11/02/22	Review deposition preparation materials.	.90	292.50
Gaske, A.	11/02/22	Communicate with team re scheduling deposition of Deponent #14 (0.2); revise Insurer #25 policy stipulation (0.4).	.60	366.00
Leveridge, R.	11/02/22	Review materials in preparation for deposition of Deponent #7 (5.8); communicate with co-counsel re same (0.2).	6.00	8,700.00
Farra, A.	11/02/22	Draft contention interrogatory responses.	.40	284.00
Sraders, S.	11/02/22	Analyze summary of Connecticut law re Issue #33.	.40	264.00
Sraders, S.	11/02/22	Revise draft deposition outline for Deponent #3.	.30	198.00
Kaminsky, E.	11/02/22	Continue research re Issue #51.	1.90	1,064.00
Turner, C.	11/02/22	Revise and finalize notice of deposition re Deponent #16.	1.00	200.00
Turner, C.	11/02/22	Calendar Deponent #16 deposition.	.20	40.00
Huddleston, D.	11/02/22	Draft summary of research re Issue #33.	2.30	1,092.50
Huddleston, D.	11/02/22	Continue research re Issue #33.	4.70	2,232.50
Agwu, I.	11/02/22	Continue research re Issue #38.	6.00	2,850.00
Agwu, I.	11/02/22	Review documents in preparation for Deponent #6 deposition.	2.00	950.00
Poz, N.	11/02/22	Review additional materials re historic agreements.	.20	65.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Poz, N.	11/02/22	Organize plaintiffs' proposed exhibits for Deponent #1 deposition.	.40	130.00
Dougherty, J.	11/02/22	Revise outline deposition of Deponent #3 (2.0); review documents for potential use in deposition of Deponent #3 (2.2).	4.20	3,024.00
Shore, R.	11/03/22	Confer with team re case status and strategy.	1.30	1,885.00
Rubinstein, J.	11/03/22	Communicate with team re Deponent #3 deposition logistics and preparation (0.4); revise deposition outline of Insurer #25 witnesses, including Deponents #1 and #2 (3.9); communicate with M. Rush re same (0.7); revise litigation task list (0.5); confer with team re strategy (1.3); confer with R. Shore re multiple strategy issues (0.9); correspond with A. Gaske and N. Poz re finalizing Insurer #25 policy stipulation (0.2).	7.90	6,715.00
Sanchez, J.	11/03/22	Research Issue #45.	1.50	712.50
Sanchez, J.	11/03/22	Confer with A. Gaske re researching Issue #45.	.40	190.00
Sanchez, J.	11/03/22	Confer with team re status and strategy.	1.30	617.50
Rush, M.	11/03/22	Communicate with R. Shore, R. Leveridge and J. Rubinstein re depositions of Insurer #25.	.90	630.00
Rush, M.	11/03/22	Revise letter to insurers re Rule 30(b)(6) meet-and-confer.	1.40	980.00
Rush, M.	11/03/22	Confer with team re litigation status and next steps.	1.30	910.00
Rush, M.	11/03/22	Revise outline re Insurer #25.	.50	350.00
Martinez, S.	11/03/22	Confer with team re case status and strategy.	1.30	422.50
Gaske, A.	11/03/22	Confer with team re litigation strategy and next steps.	1.30	793.00
Gaske, A.	11/03/22	Complete revisions to Insurer #25 policy stipulation (1.2); confer with J. Sanchez re status of research on Issue #45 (0.4).	1.60	976.00
Leveridge, R.	11/03/22	Review documents re Deponent #7.	1.40	2,030.00
Leveridge, R.	11/03/22	Review and revise outline for Deponents #1 and #2 depositions (0.8); communicate with J. Rubinstein and M. Rush re same (0.8).	1.60	2,320.00
Ogrey, S.	11/03/22	Review and organize materials for Deponent #1 deposition.	1.60	384.00
Ogrey, S.	11/03/22	Confer with team re litigation update and strategy.	1.30	312.00
Farra, A.	11/03/22	Confer with team re litigation status update.	1.30	923.00
Sraders, S.	11/03/22	Confer with team re status and next steps.	1.30	858.00
Sraders, S.	11/03/22	Revise draft deposition outline for Deponent #3.	1.30	858.00
Sraders, S.	11/03/22	Revise memorandum re Issue #56.	.40	264.00
Kaminsky, E.	11/03/22	Confer with team re litigation update.	1.30	728.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Kaminsky, E.	11/03/22	Draft memorandum re Issue #51.	1.70	952.00
Kaminsky, E.	11/03/22	Revise stipulation re Insurer #36.	.90	504.00
Turner, C.	11/03/22	Draft notice of deposition for Deponent #14.	1.00	200.00
Turner, C.	11/03/22	Confer with team re litigation strategy and case update.	1.30	260.00
Turner, C.	11/03/22	Review and organize Deponent #3 deposition materials.	.30	60.00
Hubbard, B.	11/03/22	Review historical settlement listing.	.30	127.50
Hubbard, B.	11/03/22	Confer with team re status and strategy.	1.30	552.50
Huddleston, D.	11/03/22	Confer with team re case status and strategy.	1.30	617.50
Huddleston, D.	11/03/22	Review case law and findings for research re Issue #33.	.50	237.50
Agwu, I.	11/03/22	Confer with team re case status and strategy.	1.30	617.50
Agwu, I.	11/03/22	Confer with J. Dougherty re Issue #38.	.30	142.50
Agwu, I.	11/03/22	Research Issue #38.	4.80	2,280.00
Agwu, I.	11/03/22	Review documents in preparation for Deponent #6 deposition.	2.20	1,045.00
Poz, N.	11/03/22	Organize proposed exhibits for Deponent #1 deposition.	.50	162.50
Poz, N.	11/03/22	Prepare bates stamped exhibits to policy stipulation with Insurer #25.	.40	130.00
Poz, N.	11/03/22	Confer with team re case status and next steps.	1.30	422.50
Poz, N.	11/03/22	Draft summary of production of documents from third party.	.80	260.00
Poz, N.	11/03/22	Update notice of Deponent #3 deposition.	.50	162.50
Dougherty, J.	11/03/22	Confer with I. Agwu re legal research of Issue #38 (0.3); review and comment on Issue #38 research (2.2).	2.50	1,800.00
Dougherty, J.	11/03/22	Confer with team re case status and next steps.	1.30	936.00
Dougherty, J.	11/03/22	Research requirements for conducting Deponent #3 deposition remotely (0.8); draft revised deposition notice for remote Deponent #3 deposition (0.6); communicate with co-counsel and opposing counsel re Deponent #3 deposition (0.3).	1.70	1,224.00
Shore, R.	11/04/22	Analyze discovery strategy.	.90	1,305.00
Girgenti, J.	11/04/22	Review and identify potential documents for upcoming Deponent #6 deposition.	6.40	2,336.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Rubinstein, J.	11/04/22	Review revised deposition notice for Deponent #14 (0.1); confer with R. Leveridge and M. Rush re Deponent #1 deposition (0.9); review summary of third-party production (0.2); review status of various discovery and research projects (0.8); review materials in preparation for Deponent #3 deposition (0.3); review discovery correspondence from Insurer #25 (0.2).	2.50	2,125.00
Rush, M.	11/04/22	Revise deposition outline re Insurer #25.	6.30	4,410.00
Rush, M.	11/04/22	Confer with R. Leveridge and J. Rubinstein re depositions of Insurer #25.	.90	630.00
Rush, M.	11/04/22	Revise letter to insurers re Rule 30(b)(6) meet-and-confer.	.60	420.00
Gaske, A.	11/04/22	Correspond with co-plaintiffs re Insurer #25 policy stipulation (0.4); finalize deposition date for Deponent #14 and review deposition notice (1.0).	1.40	854.00
Leveridge, R.	11/04/22	Revise outline for Insurer #25 depositions (0.3); confer with J. Rubinstein and M. Rush re same (0.9); review letter from Insurer #25 counsel re discovery issues directed to Debtors (0.2).	1.40	2,030.00
Ogrey, S.	11/04/22	Analyze Insurer #15 document production.	7.20	1,728.00
Turner, C.	11/04/22	Finalize Deponent #14 deposition notice.	.60	120.00
Huddleston, D.	11/04/22	Review pleadings in preparation for research related to upcoming depositions.	.60	285.00
Agwu, I.	11/04/22	Finish reviewing documents in preparation for Deponent #6 deposition.	8.00	3,800.00
Poz, N.	11/04/22	Communicate with team re exhibits for Deponents #2 and #3 depositions.	.10	32.50
Poz, N.	11/04/22	Organize documents in preparation for Deponent #3 deposition.	.40	130.00
Poz, N.	11/04/22	Finalize notice of Deponent #3 deposition.	.30	97.50
Poz, N.	11/04/22	Update tracking spreadsheet re recent discovery communications with Insurer #25.	.20	65.00
Dougherty, J.	11/04/22	Review revised deposition outline for Deponent #1 for relevant changes and comments for drafting outline re Deponent #3.	.40	288.00
Dougherty, J.	11/04/22	Communicate with team re document handling procedure for remote deposition.	.30	216.00
Dougherty, J.	11/04/22	Communicate with opposing counsel re document handling protocol for remote deposition.	.50	360.00
Dougherty, J.	11/04/22	Revise draft outline for Deponent #3 deposition.	1.00	720.00
Dougherty, J.	11/04/22	Review documents for Deponent #3 deposition.	1.60	1,152.00
Huddleston, D.	11/05/22	Draft summary re Issue #33.	1.00	475.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Rubinstein, J.	11/06/22	Communicate with co-counsel re Insurer #25 deposition preparation.	.20	170.00
Rush, M.	11/06/22	Communicate with L. Szymanski re deposition of Insurer #25.	.40	280.00
Shore, R.	11/07/22	Confer with R. Leveridge and J. Rubinstein re strategy.	.70	1,015.00
Rubinstein, J.	11/07/22	Correspond with co-counsel re Deponent #1 deposition (0.4); review additional documents in preparation for same (1.4); confer with R. Shore and R. Leveridge re strategy (0.7); confer with team re status of legal research issues (0.3); review summary of Insurer #15 supplemental production (0.3); revise discovery correspondence (1.2).	4.30	3,655.00
Sanchez, J.	11/07/22	Confer with A. Gaske re status of research of Issue #45.	.30	142.50
Rush, M.	11/07/22	Revise deposition outline re Insurer #25.	7.60	5,320.00
Rush, M.	11/07/22	Confer with D. Huddleston re tracking Issue #19.	.30	210.00
Martinez, S.	11/07/22	Review supplemental exhibits in preparation for deposition of Insurer #24.	.40	130.00
Gaske, A.	11/07/22	Research recent case law re Issue #27.	2.10	1,281.00
Gaske, A.	11/07/22	Confer with J. Sanchez re research on Issue #45.	.30	183.00
Leveridge, R.	11/07/22	Confer with R. Shore and J. Rubinstein re litigation strategy.	.70	1,015.00
Leveridge, R.	11/07/22	Communicate with co-counsel re deposition.	.40	580.00
Ogrey, S.	11/07/22	Complete review of Insurer #15 document production.	4.30	1,032.00
Sraders, S.	11/07/22	Review documents for upcoming deposition of Deponent #3.	3.80	2,508.00
Sraders, S.	11/07/22	Correspond with J. Rubinstein, J. Dougherty, and I. Agwu re legal memoranda.	.40	264.00
Turner, C.	11/07/22	Review and organize Deponent #1 deposition materials.	.30	60.00
Huddleston, D.	11/07/22	Confer with M. Rush re researching potential deponent testimony in other cases.	.30	142.50
Huddleston, D.	11/07/22	Draft summary of case law re Issue #33.	2.90	1,377.50
Agwu, I.	11/07/22	Continue research re Issue #38.	4.00	1,900.00
Agwu, I.	11/07/22	Begin drafting memorandum re Issue #38.	5.00	2,375.00
Poz, N.	11/07/22	Review additional documents in preparation for Deponent #1 deposition.	.90	292.50
Poz, N.	11/07/22	Review pending insurance coverage cases (0.8); draft summary re same (0.7).	1.50	487.50

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Poz, N.	11/07/22	Review additional proposed exhibits to Deponent #1 deposition.	.30	97.50
Dougherty, J.	11/07/22	Review documents for Deponent #3 deposition.	3.90	2,808.00
Dougherty, J.	11/07/22	Communicate with team re revisions to letter memorializing Rule 30(b)(6) meet-and-confer with opposing counsel.	.80	576.00
Dougherty, J.	11/07/22	Revise draft outline for Deponent #3 deposition.	1.10	792.00
Girgenti, J.	11/08/22	Review and identify potential documents for Deponent #6 deposition.	6.20	2,263.00
Rubinstein, J.	11/08/22	Communicate with R. Leveridge re multiple projects (0.2); review proposed edits to deposition outline received from co-counsel (0.5); review draft stipulation re Debtors' Rule 30(b)(6) topic #9 and provide comments (0.2); confer with L. Szymanski re deposition strategy (0.5); revise deposition outline (2.0).	3.40	2,890.00
Rush, M.	11/08/22	Revise outline in preparation for deposition.	3.50	2,450.00
Gaske, A.	11/08/22	Continue to research updated case law re Issue #27.	3.00	1,830.00
Leveridge, R.	11/08/22	Communicate with co-counsel re discovery issues.	.40	580.00
Leveridge, R.	11/08/22	Communicate with Consulting Expert A re status of analysis.	1.10	1,595.00
Leveridge, R.	11/08/22	Revise outline for offensive deposition of insurer personnel.	1.60	2,320.00
Ogrey, S.	11/08/22	Research underlying settlements.	.60	144.00
Sraders, S.	11/08/22	Research re Issue #66.	2.10	1,386.00
Sraders, S.	11/08/22	Communicate with J. Rubinstein and J. Dougherty re upcoming deposition.	.50	330.00
Sraders, S.	11/08/22	Revise memorandum re Issue #56.	.90	594.00
Turner, C.	11/08/22	Review and organize materials for Deponent #2 deposition.	1.90	380.00
Hubbard, B.	11/08/22	Review personal injury complaint spreadsheet in the context of prior proof of claim form review.	.70	297.50
Agwu, I.	11/08/22	Research Issue #14.	5.00	2,375.00
Agwu, I.	11/08/22	Continue drafting memorandum re Issue #38.	6.00	2,850.00
Poz, N.	11/08/22	Review and organize materials in preparation for Deponent #2 deposition.	.70	227.50
Poz, N.	11/08/22	Organize exhibits re Deponent #1 deposition.	1.70	552.50
Poz, N.	11/08/22	Review documents for deposition of Deponent #3.	.10	32.50
Dougherty, J.	11/08/22	Review and comment on legal research re Issue #38.	.80	576.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Dougherty, J.	11/08/22	Review and revise draft memorandum re legal issues related to Issue #38.	1.20	864.00
Dougherty, J.	11/08/22	Review documents for Deponent #3 deposition.	.80	576.00
Dougherty, J.	11/08/22	Revise draft outline for Deponent #3 deposition.	.40	288.00
Rubinstein, J.	11/09/22	Review issues in preparation for deposition (0.5); participate in deposition (8.2).	8.70	7,395.00
Rush, M.	11/09/22	Attend deposition.	8.20	5,740.00
Rush, M.	11/09/22	Revise outline for deposition.	1.00	700.00
Martinez, S.	11/09/22	Confer with PlanetDepos re technical issues during deposition.	.40	130.00
Gaske, A.	11/09/22	Continue to research updated case law re Issue #27.	2.60	1,586.00
Gaske, A.	11/09/22	Analyze documents produced by Insurer #23 for deposition preparation.	5.20	3,172.00
Leveridge, R.	11/09/22	Communicate with team re deposition strategy.	.40	580.00
Leveridge, R.	11/09/22	Review status of certain legal research projects.	.70	1,015.00
Sraders, S.	11/09/22	Revise deposition outline for Deponent #3.	1.20	792.00
Kaminsky, E.	11/09/22	Research re Issue #51.	1.10	616.00
Turner, C.	11/09/22	Review and organize documents re Rule 30(b)(6) topic 9.	.50	100.00
Hubbard, B.	11/09/22	Communicate with R. Leveridge re status of Consulting Expert A work.	.30	127.50
Agwu, I.	11/09/22	Revise memorandum re Issue #38 per comments from J. Dougherty.	5.00	2,375.00
Agwu, I.	11/09/22	Continue researching Issue #38.	3.00	1,425.00
Agwu, I.	11/09/22	Draft summary of research re Issue #14.	2.00	950.00
Poz, N.	11/09/22	Review materials uploaded for deposition.	.20	65.00
Poz, N.	11/09/22	Attend (remotely) deposition to assist with exhibits.	6.80	2,210.00
Dougherty, J.	11/09/22	Revise draft outline for Deponent #3 deposition.	1.10	792.00
Dougherty, J.	11/09/22	Review documents for deposition of Deponent #3.	2.10	1,512.00
Shore, R.	11/10/22	Confer with team re status, strategy, and next steps.	.60	870.00
Rubinstein, J.	11/10/22	Confer with team re strategy and open tasks (0.6); update litigation task list (0.3); confer with R. Leveridge re strategy (0.5); communicate with A. Gaske re deposition strategy (0.3); finalize deposition protocol (0.2).	1.90	1,615.00
Sanchez, J.	11/10/22	Research Issue #45.	3.40	1,615.00
Sanchez, J.	11/10/22	Confer with team re status of case and strategy.	.60	285.00
Rush, M.	11/10/22	Confer with team re case status and strategy.	.60	420.00
Martinez, S.	11/10/22	Confer with team re case status and strategy.	.60	195.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Bonesteel, A.	11/10/22	Confer with team re ongoing projects and case status.	.60	225.00
Gaske, A.	11/10/22	Confer with team re strategy and case status.	.60	366.00
Gaske, A.	11/10/22	Draft memorandum re updated case law on Issue #27.	3.40	2,074.00
Gaske, A.	11/10/22	Review documents produced by Insurer #23 for deposition preparation.	1.00	610.00
Leveridge, R.	11/10/22	Review summary of legal research from S. Sraders.	.40	580.00
Leveridge, R.	11/10/22	Confer with team re litigation status and strategy.	.60	870.00
Leveridge, R.	11/10/22	Confer with counsel for Deponent #13 (0.4); communicate with P. Breene re same (0.2).	.60	870.00
Leveridge, R.	11/10/22	Confer with J. Rubinstein re discovery issues and upcoming depositions.	.50	725.00
Ogrey, S.	11/10/22	Confer with Veritext re Deponents #2 and #3 depositions.	.70	168.00
Ogrey, S.	11/10/22	Confer with team re case strategy.	.60	144.00
Farra, A.	11/10/22	Analyze deposition testimony in case.	1.10	781.00
Farra, A.	11/10/22	Confer with team re litigation status update.	.60	426.00
Sraders, S.	11/10/22	Revise draft outline for upcoming deposition of Deponent #3.	1.00	660.00
Sraders, S.	11/10/22	Draft summary of research re Issue #66.	.80	528.00
Kaminsky, E.	11/10/22	Confer with team re litigation status and strategy.	.60	336.00
Turner, C.	11/10/22	Review and organize third-party subpoenas.	.30	60.00
Turner, C.	11/10/22	Confer with team re litigation strategy and case update.	.60	120.00
Turner, C.	11/10/22	Calendar deposition of Deponent #17.	.30	60.00
Turner, C.	11/10/22	Review and organize rough deposition transcript.	.10	20.00
Hubbard, B.	11/10/22	Confer with team re status and strategy.	.60	255.00
Huddleston, D.	11/10/22	Confer with team re case update and strategy.	.60	285.00
Agwu, I.	11/10/22	Confer with team re case update and strategy.	.60	285.00
Poz, N.	11/10/22	Communicate with court reporter re remote share exhibits in preparation for Deponent #2 deposition.	.20	65.00
Poz, N.	11/10/22	Confer with team re case status and next steps.	.60	195.00
Poz, N.	11/10/22	Review materials prepared for Deponent #2 deposition.	.30	97.50
Dougherty, J.	11/10/22	Confer with team re case update and next steps.	.60	432.00
Dougherty, J.	11/10/22	Revise draft memorandum to co-counsel re Issue #38.	1.50	1,080.00
Dougherty, J.	11/10/22	Revise draft outline for Deponent #3 deposition.	.60	432.00
Dougherty, J.	11/10/22	Review documents for deposition of Deponent #3.	.80	576.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Rubinstein, J.	11/11/22	Begin review of Deponent #17 materials in preparation for defense of deposition.	2.00	1,700.00
Rush, M.	11/11/22	Revise outline for Deponent #2.	2.50	1,750.00
Gaske, A.	11/11/22	Confer with Debtors' counsel re documents produced in response to FDA subpoena.	.10	61.00
Leveridge, R.	11/11/22	Review memorandum re legal strategies.	.40	580.00
Leveridge, R.	11/11/22	Analyze strategy re upcoming depositions.	.80	1,160.00
Leveridge, R.	11/11/22	Communicate with opposing counsel and co-counsel re deposition of Deponent #7.	.40	580.00
Ogrey, S.	11/11/22	Review and organize materials for Deponent #3 deposition.	.90	216.00
Sraders, S.	11/11/22	Revise draft memorandum re Issue #33.	2.20	1,452.00
Sraders, S.	11/11/22	Review documents in preparation for deposition of Deponent #3.	1.60	1,056.00
Turner, C.	11/11/22	Review and organize Insurers #5 and #23 policies.	.50	100.00
Huddleston, D.	11/11/22	Fact research for upcoming depositions.	5.70	2,707.50
Poz, N.	11/11/22	Catalog documents for upcoming deposition.	.50	162.50
Dougherty, J.	11/11/22	Revise draft outline for deposition of Deponent #3.	.40	288.00
Dougherty, J.	11/11/22	Review documents for Deponent #3 deposition.	.90	648.00
Gaske, A.	11/13/22	Review draft memorandum re Issue #45.	.70	427.00
Leveridge, R.	11/13/22	Review materials and outline in preparation for deposition.	2.40	3,480.00
Shore, R.	11/14/22	Attend deposition (partial).	2.50	3,625.00
Rubinstein, J.	11/14/22	Correspond with R. Shore, R. Leveridge, and M. Rush re deposition strategy (0.5); review correspondence re pleadings (0.3); continue review of materials in preparation for Deponent #17 deposition (1.5).	2.30	1,955.00
Rush, M.	11/14/22	Review outline for upcoming deposition.	1.00	700.00
Rush, M.	11/14/22	Attend deposition.	4.50	3,150.00
Gaske, A.	11/14/22	Draft portion of outline for Deponent #4 deposition.	.90	549.00
Leveridge, R.	11/14/22	Attend deposition (4.5); communicate with co-counsel re deposition issues (0.5).	5.00	7,250.00
Ogrey, S.	11/14/22	Revise / update deposition schedule.	.20	48.00
Sraders, S.	11/14/22	Confer with J. Dougherty re preparation for deposition.	.40	264.00
Sraders, S.	11/14/22	Review documents in preparation for deposition.	1.50	990.00
Sraders, S.	11/14/22	Communicate with J. Dougherty and N. Poz re background research for upcoming depositions.	.20	132.00
Huddleston, D.	11/14/22	Continue fact research for upcoming depositions.	3.90	1,852.50
Poz, N.	11/14/22	Review materials uploaded for deposition.	.10	32.50

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Poz, N.	11/14/22	Attend deposition to assist with exhibits.	4.50	1,462.50
Poz, N.	11/14/22	Communicate with S. Sraders re research and tracking summary re Deponent #3 deposition.	.10	32.50
Dougherty, J.	11/14/22	Confer with S. Sraders re exhibits for deposition.	.40	288.00
Dougherty, J.	11/14/22	Review documents for upcoming deposition.	2.30	1,656.00
Dougherty, J.	11/14/22	Revise draft deposition outline.	2.80	2,016.00
Shore, R.	11/15/22	Review issues re Insurers #5 and #36 (0.6); communicate with R. Leveridge and J. Rubinstein re same (0.6).	1.20	1,740.00
Rubinstein, J.	11/15/22	Confer with R. Leveridge re litigation strategy (0.7); confer with S. Sraders re deposition strategy in advance of multiple upcoming depositions (0.2); communicate with team re Deponent #3 deposition (0.5); revise outline re same (0.7); review status of finalizing Insurer #25 policy stipulation (0.2); review production correspondence (0.1); communicate with Debtors' counsel re Deponent #6 deposition preparation (0.5); review insurer correspondence (0.2); analyze multiple issues and provide comments to various team members re open projects (0.5); revise stipulation re Debtors' Rule 30(b)(6) topic 9 (0.4); communicate with co-counsel re same (0.2).	4.20	3,570.00
Rush, M.	11/15/22	Review documents produced by Debtors in preparation for deposition of Deponent #6.	3.60	2,520.00
Rush, M.	11/15/22	Confer with J. Dougherty and S. Sraders re Deponent #3 deposition.	.30	210.00
Martinez, S.	11/15/22	Review and organize current scheduling and pre-trial order.	.10	32.50
Gaske, A.	11/15/22	Draft portion of deposition outline for Deponent #4.	4.30	2,623.00
Gaske, A.	11/15/22	Analyze documents in preparation for deposition of Deponent #4.	1.90	1,159.00
Leveridge, R.	11/15/22	Confer with J. Rubinstein re Deponent #2 deposition and other litigation issues.	.70	1,015.00
Leveridge, R.	11/15/22	Communicate with co-counsel re insurer correspondence (0.6); communicate with R. Shore and J. Rubinstein re same (0.3).	.90	1,305.00
Leveridge, R.	11/15/22	Analyze Deponent #2 deposition issues.	.40	580.00
Leveridge, R.	11/15/22	Analyze issues re discovery and deposition schedule.	1.60	2,320.00
Ogrey, S.	11/15/22	Organize materials for upcoming deposition.	4.50	1,080.00
Sraders, S.	11/15/22	Analyze documents for deposition.	5.20	3,432.00
Huddleston, D.	11/15/22	Factual research for upcoming depositions.	4.80	2,280.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Dougherty, J.	11/15/22	Communicate with team re finalizing exhibits for deposition.	.40	288.00
Dougherty, J.	11/15/22	Revise draft outline for upcoming deposition.	1.10	792.00
Dougherty, J.	11/15/22	Review documents for upcoming deposition.	.90	648.00
Shore, R.	11/16/22	Review issues re certain affirmative defenses and related letter from insurer.	.20	290.00
Rubinstein, J.	11/16/22	Revise deposition outline (3.0); confer with J. Dougherty re same (1.2); analyze correspondence from Insurer #25 (0.4); confer with R. Leveridge and E. Kaminsky re discovery correspondence re privilege issues (0.3); review correspondence re deposition protocol (0.2); review materials in preparation for Deponent #6 deposition (1.4).	6.50	5,525.00
Rush, M.	11/16/22	Analyze letter from C. Sorensen re rescission claim.	1.00	700.00
Rush, M.	11/16/22	Confer with L. Szymanski re deposition preparation for Deponent #6.	.40	280.00
Rush, M.	11/16/22	Communicate with R. Leveridge and J. Rubinstein re deposition preparation for Deponent #6.	.30	210.00
Rush, M.	11/16/22	Draft letter to Insurer #25.	3.50	2,450.00
Bonesteel, A.	11/16/22	Review Insurer #5 productions.	1.60	600.00
Gaske, A.	11/16/22	Draft remaining portions of outline for deposition of Deponent #4.	7.20	4,392.00
Gaske, A.	11/16/22	Analyze next steps for researching Issue #45.	.30	183.00
Leveridge, R.	11/16/22	Confer with J. Rubinstein and E. Kaminsky re discovery strategy.	.30	435.00
Leveridge, R.	11/16/22	Communicate with expert re status.	.30	435.00
Leveridge, R.	11/16/22	Communicate with UCC counsel re insert to letter to insurers (0.7); communicate with Debtors' counsel re same (0.4); review additional letters from insurers re discovery issues (0.4); review communications from Debtors' counsel re discovery matters (0.3); review subpoena to Deponent #7 (0.1).	1.90	2,755.00
Leveridge, R.	11/16/22	Communicate with co-counsel re Deponent #13 deposition.	.40	580.00
Leveridge, R.	11/16/22	Communicate with M. Rush re deficiency letter to Insurer #25.	.30	435.00
Leveridge, R.	11/16/22	Review outline for deposition of Deponent #3.	.60	870.00
Ogrey, S.	11/16/22	Prepare materials for Deponent #3 deposition.	1.30	312.00
Sraders, S.	11/16/22	Analyze documents in preparation for upcoming deposition.	1.30	858.00
Sraders, S.	11/16/22	Confer with M. Rush re strategy for upcoming deposition.	.20	132.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Sraders, S.	11/16/22	Confer with A. Bonesteel re Insurer #5 production.	.40	264.00
Kaminsky, E.	11/16/22	Confer with R. Leveridge and J. Rubinstein re discovery strategy.	.30	168.00
Kaminsky, E.	11/16/22	Revise letter to insurers re discovery dispute.	.80	448.00
Hubbard, B.	11/16/22	Research Insurer #25 policy.	.10	42.50
Poz, N.	11/16/22	Update tracking spreadsheet re recent production from co-plaintiffs.	.60	195.00
Dougherty, J.	11/16/22	Revise draft outline for upcoming deposition.	3.30	2,376.00
Dougherty, J.	11/16/22	Confer with J. Rubinstein re deposition strategy.	1.20	864.00
Rubinstein, J.	11/17/22	Review materials in preparation for deposition (1.1); participate in deposition (6.0); confer with R. Leveridge re strategy (0.5); analysis re Deponent #13 (0.5); communicate with M. Rush re Insurer #25 discovery issues (0.3); communicate with Debtors' counsel re strategy and deposition scheduling (0.4).	8.80	7,480.00
Rush, M.	11/17/22	Draft letter to Insurer #25 re discovery deficiencies.	7.20	5,040.00
Bonesteel, A.	11/17/22	Review Debtors' productions and update production log for volumes 29-44.	.70	262.50
Leveridge, R.	11/17/22	Begin review of draft outline for Deponent #4 deposition.	3.50	5,075.00
Leveridge, R.	11/17/22	Confer with J. Rubinstein re strategy.	.50	725.00
Leveridge, R.	11/17/22	Confer with counsel for Deponent #13.	1.30	1,885.00
Leveridge, R.	11/17/22	Communicate with J. Rubinstein re deposition strategy.	.60	870.00
Ogrey, S.	11/17/22	Communicate with Veritext re issues with deposition exhibits.	.30	72.00
Ogrey, S.	11/17/22	Review and organize notice of deposition for Deponent #7.	.40	96.00
Ogrey, S.	11/17/22	Attend deposition to assist with exhibits.	6.00	1,440.00
Sraders, S.	11/17/22	Review Insurer #5 production documents relevant to deposition.	.80	528.00
Poz, N.	11/17/22	Review and organize marked exhibits and rough deposition transcripts.	.40	130.00
Dougherty, J.	11/17/22	Review deposition outline for deposition (1.0); participate in deposition (6.0).	7.00	5,040.00
Rubinstein, J.	11/18/22	Review status of discovery and related issues (1.3); confer with Debtors' counsel and R. Leveridge re case strategy (1.5); confer with P. Bedell re deposition scheduling (0.3).	3.10	2,635.00
Rush, M.	11/18/22	Draft letter to Insurer #25 re discovery deficiencies.	3.40	2,380.00
Leveridge, R.	11/18/22	Analyze litigation strategy and discovery issues.	.60	870.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Leveridge, R.	11/18/22	Confer with Debtors' counsel and J. Rubinstein re discovery issues and strategy questions.	1.50	2,175.00
Leveridge, R.	11/18/22	Review material re Deponent #13 (0.8); communicate with counsel for Deponent #13 and Debtors' counsel re same (0.5).	1.30	1,885.00
Leveridge, R.	11/18/22	Revise deficiency letter to Insurer #25.	.60	870.00
Poz, N.	11/18/22	Communicate with Veritext re Deponents #4 and #5 depositions.	.20	65.00
Poz, N.	11/18/22	Revise citations in discovery letter to Insurer #25.	1.80	585.00
Rush, M.	11/19/22	Draft letter to Insurer #25 re discovery deficiencies.	.60	420.00
Rubinstein, J.	11/20/22	Revise discovery correspondence.	1.80	1,530.00
Shore, R.	11/21/22	Confer with Debtors and UCC counsel re case schedule.	1.00	1,450.00
Shore, R.	11/21/22	Confer with team re litigation status and next steps.	.40	580.00
Rubinstein, J.	11/21/22	Confer with co-counsel re strategy (0.6); revise litigation task list (0.4); confer with R. Leveridge re action items (0.3); confer with team re tasks and strategy (0.4); communicate with Debtors' counsel re discovery letters (0.3); begin review of Deponent #2 transcript (1.4).	3.40	2,890.00
Sanchez, J.	11/21/22	Research Issue #45.	4.00	1,900.00
Sanchez, J.	11/21/22	Confer with team re status of tasks and status of discovery issues.	.40	190.00
Rush, M.	11/21/22	Draft letter to Insurer #25 re discovery deficiencies.	4.60	3,220.00
Rush, M.	11/21/22	Confer with team re case status and strategy.	.40	280.00
Martinez, S.	11/21/22	Confer with team re case status and strategy.	.40	130.00
Bonesteel, A.	11/21/22	Confer with team upcoming projects and case status.	.40	150.00
Gaske, A.	11/21/22	Confer with team re case strategy and next steps.	.40	244.00
Gaske, A.	11/21/22	Analyze co-counsel deposition tracking chart.	.50	305.00
Leveridge, R.	11/21/22	Communicate with co-counsel re strategic issues (0.6); communicate with J. Rubinstein re same (0.3); communicate with P. Breene and A. Crawford re same (0.4).	1.30	1,885.00
Leveridge, R.	11/21/22	Communicate with M. Rush re discovery issues and motions practice.	.30	435.00
Leveridge, R.	11/21/22	Communicate with counsel for Deponent #13 re deposition related matters.	.90	1,305.00
Leveridge, R.	11/21/22	Confer with P. Breene (Reed Smith) and J. Davis (Willkie) re schedule changes.	.40	580.00
Leveridge, R.	11/21/22	Confer with team re litigation update and strategy.	.40	580.00
Farra, A.	11/21/22	Confer with team re litigation update.	.40	284.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Sraders, S.	11/21/22	Confer with team re recent developments and strategy for next steps.	.40	264.00
Sraders, S.	11/21/22	Review Deponent #2 deposition transcript.	.40	264.00
Kaminsky, E.	11/21/22	Confer with team re case status and strategy.	.40	224.00
Hubbard, B.	11/21/22	Confer with team re status and strategy.	.40	170.00
Huddleston, D.	11/21/22	Confer with team re case status and strategy.	.40	190.00
Agwu, I.	11/21/22	Confer with team re case status and strategy.	.40	190.00
Poz, N.	11/21/22	Review final transcript of Deponent #1 deposition and marked exhibits.	.50	162.50
Poz, N.	11/21/22	Confer with team re case status and next steps.	.40	130.00
Poz, N.	11/21/22	Compare and update data in co-counsel deposition tracking databases.	.90	292.50
Dougherty, J.	11/21/22	Confer with team re case update and strategy.	.40	288.00
Rubinstein, J.	11/22/22	Communicate with L. Szymanski re open discovery issues (0.4); analysis re Deponent #13 (0.3); review materials in preparation for deposition preparation session re Deponent #6 (0.8); participate in same (4.3).	5.80	4,930.00
Rush, M.	11/22/22	Participate in deposition preparation with Deponent #6.	4.30	3,010.00
Bonesteel, A.	11/22/22	Update Debtors' production log for volumes 29-44.	1.40	525.00
Leveridge, R.	11/22/22	Communicate with counsel for Deponent #13 re deposition scheduling and related issues.	.30	435.00
Leveridge, R.	11/22/22	Review deposition materials re Deponent #6.	1.10	1,595.00
Ogrey, S.	11/22/22	Review and organize materials for deposition of Deponent #6.	1.00	240.00
Sraders, S.	11/22/22	Analyze testimony from Deponent #2 deposition.	1.30	858.00
Kaminsky, E.	11/22/22	Research re Issue #52.	1.00	560.00
Rubinstein, J.	11/23/22	Analysis of documents re deposition preparation session of Deponent #6 (0.5); continue review of Deponent #2 deposition transcript (1.6).	2.10	1,785.00
Gaske, A.	11/23/22	Revise policy stipulations re Insurers #9 and #23.	.40	244.00
Leveridge, R.	11/23/22	Communicate with counsel for Deponent #13 re schedule (0.4); communicate with counsel for Debtors re same (0.4).	.80	1,160.00
Leveridge, R.	11/23/22	Communicate with team re strategy issues.	.60	870.00
Poz, N.	11/23/22	Review and organize documents in preparation for Deponent #6 deposition.	1.40	455.00
Poz, N.	11/23/22	Communicate with co-plaintiff's e-discovery vendor re retrieving certain materials from past productions.	.30	97.50

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Poz, N.	11/23/22	Upload productions from co-counsel.	.30	97.50
Rubinstein, J.	11/25/22	Revise Deponent #4 deposition outline.	2.70	2,295.00
Kaminsky, E.	11/26/22	Research re Issue #52.	1.00	560.00
Gaske, A.	11/27/22	Revise memorandum on Issue #45.	1.20	732.00
Shore, R.	11/28/22	Confer with R. Leveridge and J. Rubinstein re litigation status, strategy, and next steps.	.90	1,305.00
Rubinstein, J.	11/28/22	Confer with R. Shore and R. Leveridge re Issue #33 and other issues (0.9); review documents re Deponent #6 in preparation for defense of deposition (3.7); review correspondence with Insurer #25 counsel re draft policy stipulation (0.1); correspond with A. Gaske re edits to Insurers #9 and #23 draft policy stipulations (0.2); correspond with team re open legal research issues (0.2); confer with C. Sorensen re firm transition and follow up with co-plaintiffs (0.5).	5.60	4,760.00
Rush, M.	11/28/22	Draft outline in preparation for meeting with Deponent #6.	7.40	5,180.00
Gaske, A.	11/28/22	Revise memorandum re Issue #45.	3.20	1,952.00
Gaske, A.	11/28/22	Revise draft policy stipulations for Insurers #9 and #23 (1.4); correspond with co-counsel re same (0.2).	1.60	976.00
Leveridge, R.	11/28/22	Confer with R. Shore and J. Rubinstein re strategy issues.	.90	1,305.00
Leveridge, R.	11/28/22	Analysis re Deponent #13 (1.6); communicate with counsel for Deponent #13 (0.4).	2.00	2,900.00
Leveridge, R.	11/28/22	Communicate with Consulting Expert A re meeting; review material re same.	.70	1,015.00
Ogrey, S.	11/28/22	Organize exhibits used in Deponent #3 deposition.	.20	48.00
Kaminsky, E.	11/28/22	Draft memorandum re Issue #51.	2.90	1,624.00
Hubbard, B.	11/28/22	Review policy language for research memorandum re Issue #51.	.80	340.00
Huddleston, D.	11/28/22	Continue factual research relevant to upcoming depositions.	1.70	807.50
Poz, N.	11/28/22	Review and bates stamp updated exhibits to policy stipulations with Insurers #9 and #23.	.70	227.50
Poz, N.	11/28/22	Revise drafts of policy stipulations with Insurers #9 and #23 to include new exhibits bates stamp numbers.	.30	97.50
Poz, N.	11/28/22	Update tracking spreadsheet to reflect productions from co-plaintiffs.	2.00	650.00
Shore, R.	11/29/22	Confer with Consulting Expert A re Issues #27 and #32 (1.6); analyze same (1.4).	3.00	4,350.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Rubinstein, J.	11/29/22	Analysis re Rhodes discovery (0.8); review materials in preparation for Deponent #6 deposition preparation sessions (2.0); review proposed edits to Insurer #25 discovery deficiency letter (0.3); confer with Consulting Expert A, R. Shore, R. Leveridge and B. Hubbard re strategy (1.6); communicate with C. Sorensen re deposition scheduling (0.2).	4.90	4,165.00
Rush, M.	11/29/22	Draft letter to Insurer #25 re discovery deficiencies.	1.70	1,190.00
Rush, M.	11/29/22	Review documents in preparation for meeting with Deponent #6.	2.90	2,030.00
Rush, M.	11/29/22	Review outline in preparation for meeting with Deponent #6.	1.20	840.00
Gaske, A.	11/29/22	Revise memorandum re Issue #45.	2.80	1,708.00
Leveridge, R.	11/29/22	Confer with Consulting Expert A, R. Shore, J. Rubinstein and B. Hubbard re analytical work.	1.60	2,320.00
Leveridge, R.	11/29/22	Communicate with counsel for Deponent #13 re deposition.	.40	580.00
Leveridge, R.	11/29/22	Review communications with co-counsel re discovery issues.	.40	580.00
Sraders, S.	11/29/22	Correspond with J. Rubinstein re strategy for 30(b)(1) depositions.	.80	528.00
Kaminsky, E.	11/29/22	Draft memorandum re Issue #51.	2.40	1,344.00
Turner, C.	11/29/22	Review and organize third-party subpoenas.	.70	140.00
Turner, C.	11/29/22	Revise calendar re Deponent #16 deposition.	.20	40.00
Hubbard, B.	11/29/22	Prepare materials for meeting with Consulting Expert A.	.30	127.50
Hubbard, B.	11/29/22	Confer with Consulting Expert A, R. Shore, R. Leveridge, and J. Rubinstein re analytical work.	1.60	680.00
Poz, N.	11/29/22	Update distribution and contact lists.	.20	65.00
Shore, R.	11/30/22	Review and revise task list for Consulting Expert A.	.30	435.00
Shore, R.	11/30/22	Analyze research memoranda.	1.00	1,450.00
Rubinstein, J.	11/30/22	Communicate with R. Leveridge re strategy (0.8); confer with Debtors' counsel and R. Leveridge re deposition strategy and additional litigation topics (0.7); revise Consulting Expert A task list (0.3); correspond with team re deposition scheduling (0.2); communicate with team re deposition process stipulation (0.2); preparation for deposition preparation meeting with Deponent #6 (2.8); review production correspondence from insurer counsel re privilege designations (0.1); review pleading filed by insurer (0.3).	5.40	4,590.00

Invoice Number: 11328894
January 4, 2023

Name	Date	Services	Hours	Amount
Rush, M.	11/30/22	Review documents in preparation for meeting with Deponent #6.	1.10	770.00
Gaske, A.	11/30/22	Revise memorandum re Issue #45.	6.50	3,965.00
Leveridge, R.	11/30/22	Analyze Rhodes discovery issues.	.70	1,015.00
Leveridge, R.	11/30/22	Confer with Reed Smith and J. Rubinstein re update.	.70	1,015.00
Leveridge, R.	11/30/22	Draft task list for Consulting Expert A.	1.60	2,320.00
Leveridge, R.	11/30/22	Communicate with opposing counsel re status of discussions re case management order (0.5); communicate with co-counsel re same (0.4).	.90	1,305.00
Leveridge, R.	11/30/22	Review communication from counsel re privilege assertions and logs from Debtors.	.30	435.00
Sraders, S.	11/30/22	Communicate with R. Leveridge re Potential Expert D.	.10	66.00
Turner, C.	11/30/22	Revise calendar re Deponent #16 deposition.	.10	20.00
Huddleston, D.	11/30/22	Continue factual research relevant to issues for upcoming depositions.	1.10	522.50
Poz, N.	11/30/22	Update logs and tracking spreadsheets re available privilege logs.	.30	97.50
Poz, N.	11/30/22	Communicate with Veritext re stipulation governing taking depositions in this case.	.10	32.50
		Project Total:	655.50	\$ 459,853.00
TOTAL CHARGEABLE HOURS			707.90	
TOTAL FEES				\$ 484,030.50

Invoice Number: 11328894
January 4, 2023

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Shore, R.	15.50	1,450.00	22,475.00
Girgenti, J.	12.60	365.00	4,599.00
Rubinstein, J.	17.70	425.00	7,522.50
Rubinstein, J.	100.80	850.00	85,680.00
Sanchez, J.	11.90	475.00	5,652.50
Rush, M.	18.60	350.00	6,510.00
Rush, M.	94.10	700.00	65,870.00
Martinez, S.	4.60	325.00	1,495.00
Bonesteel, A.	4.70	375.00	1,762.50
Gaske, A.	55.30	610.00	33,733.00
Leveridge, R.	12.20	725.00	8,845.00
Leveridge, R.	64.80	1,450.00	93,960.00
Ogrey, S.	31.10	240.00	7,464.00
Farra, A.	6.80	710.00	4,828.00
Sraders, S.	32.80	660.00	21,648.00
Kaminsky, E.	18.10	560.00	10,136.00
Turner, C.	13.00	200.00	2,600.00
Hubbard, B.	6.40	425.00	2,720.00
Huddleston, D.	35.10	475.00	16,672.50
Agwu, I.	62.60	475.00	29,735.00
Poz, N.	35.70	325.00	11,602.50
Dougherty, J.	53.50	720.00	38,520.00
TOTALS	707.90		\$ 484,030.50

TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	3.10	620.00
A006	Employment / Fee Applications	.80	680.00
A015	Non-Working Travel (Billed @ 50%)	48.50	22,877.50
A020	Insurance Adversary Proceeding	655.50	459,853.00

EXPENSE DETAILS

E107: Delivery Services/Messenger

Date	Description	Task	Amount
11/04/22	Messenger & Delivery / United Parcel Service / David Castello / 11.04.22	E107	120.02
11/08/22	Messenger & Delivery / United Parcel Service / Paul Breene (Reed Smith LLP) / 11.08.22	E107	154.84
11/15/22	Messenger & Delivery / United Parcel Service / Shook Hardy & Bacon LLP / 11.15.22	E107	143.02
	Sub-Total of Expenses:		\$ 417.88

Invoice Number: 11328894
January 4, 2023

E110: Out-of-Town Travel

Date	Description	Task	Amount
11/02/22	Travel - Train Fare / Jason Rubinstein / Travel (roundtrip) from Washington, DC to Stamford, CT / Attend deposition preparation meeting / 11/01-02/2022	E110	522.00
11/02/22	Travel - Parking / Jason Rubinstein / Stamford, CT / Attend deposition preparation meeting / 11/01-02/2022	E110	50.00
11/02/22	Travel - Lodging / Jason Rubinstein / Stamford, CT / Attend deposition preparation meeting / 11/01-02/2022 (1 night)	E110	359.95
11/02/22	Travel - Meals / Jason Rubinstein / Stamford, CT / Attend deposition preparation meeting / 11/01-02/2022 (2 meals)	E110	27.78
11/03/22	Travel - Train Fare / Richard Leveridge / Travel (roundtrip) Washington, DC to Stamford, CT / Attend deposition preparation meeting / 11/1-3/2022	E110	566.00
11/03/22	Travel - Parking / Richard Leveridge / Stamford, CT / Attend deposition preparation meeting / 11/1-3/2022	E110	75.00
11/03/22	Travel - Lodging / Richard Leveridge / Stamford, CT / Attend deposition preparation meeting / 11/1-3/2022 (2 nights)	E110	719.90
11/03/22	Travel - Taxi Fare / Richard Leveridge / Stamford, CT / Attend deposition preparation meeting / 11/1-3/2022	E110	20.00
11/03/22	Travel - Meals / Richard Leveridge / Stamford, CT / Attend deposition preparation meeting / 11/1-3/2022 (2 breakfasts)	E110	54.08
11/03/22	Travel - Meals / Richard Leveridge / Stamford, CT / Dinner with J. Rubinstein / Attend deposition preparation meeting / 11/1-3/2022	E110	97.27
11/09/22	Travel - Mileage / Jason Rubinstein / Travel (roundtrip), Potomac, MD to Pittsburgh, PA / Attend Deposition / 11/08-09/2022 (501 miles @ \$0.625 / mile)	E110	313.13
11/09/22	Travel - Parking / Jason Rubinstein / Pittsburgh, PA / Attend Deposition / 11/08-09/2022 (parking @ hotel)	E110	20.00
11/09/22	Travel - Lodging / Jason Rubinstein / Pittsburgh, PA / Attend Deposition / 11/08-09/2022 (1 night)	E110	389.88
11/09/22	Travel - Lodging / Michael Rush / Pittsburgh, PA / Attend Deposition / 11/08-09/2022 (1 night)	E110	393.98
11/09/22	Travel - Meals / Jason Rubinstein / Pittsburgh, PA / Attend Deposition / 11/08-09/2022 (2 meals)	E110	23.23
11/09/22	Travel - Meals / Jason Rubinstein / Pittsburgh, PA / Dinner with L. Szymanski (Reed Smith) and M. Rush / Attend deposition / 11/08-09/2022	E110	124.86
11/09/22	Travel - Meals / Michael Rush / Pittsburgh, PA / Attend Deposition / 11/08-09/2022 (1 meal)	E110	23.26
11/14/22	Travel - Train Fare / Mike Rush / Travel (roundtrip) Washington, DC to New York, NY / Attend deposition / 11.13-14.2022	E110	495.00
11/14/22	Travel - Lodging / Mike Rush / New York, NY / Attend deposition / 11.13-14.2022 (1 night)	E110	461.35
11/14/22	Travel - Meals / Mike Rush / New York, NY / Attend deposition / Breakfast with R. Leveridge / 11.13-14.2022	E110	67.99
11/15/22	Travel - Train Fare / Rick Leveridge / New York, NY / Attend deposition / 11.13-14.2022	E110	509.00
11/15/22	Travel - Parking / Rick Leveridge / New York, NY / Attend deposition / 11.13-14.2022	E110	50.00

Invoice Number: 11328894
January 4, 2023

Date	Description	Task	Amount
11/15/22	Travel - Lodging / Rick Leveridge / New York, NY / Attend deposition / 11.13-14.2022 (1 night)	E110	484.31
11/15/22	Travel - Taxi Fare / Rick Leveridge / New York, NY / Attend deposition / 11.13-14.2022	E110	50.00
11/15/22	Travel - Meals / Rick Leveridge / New York, NY / Attend deposition / Dinner with M. Rush / 11.13-14.2022	E110	100.00
Sub-Total of Expenses:			\$ 5,997.97

E115: Deposition / Transcripts

Date	Description	Task	Amount
11/09/22	Depositions / Transcript - Veritext / Videography of deposition / 2022.11.09	E115	1,455.00
11/09/22	Depositions/Transcripts / Veritext / Transcript of deposition / 2022.11.09	E115	2,721.15
11/14/22	Depositions / Transcript - Veritext / Transcript of deposition / 11.14.2022	E115	1,759.45
11/14/22	Depositions/Transcripts / Veritext / Videography of deposition / 2022.11.14	E115	1,113.00
Sub-Total of Expenses:			\$ 7,048.60

E118: Litigation Support Vendors

Date	Description	Task	Amount
10/31/22	Contracted Professional Services - Cobra Legal Solutions LLC / Tech Time/License/ Hosting: Oct 2022	E118	1,142.82
Sub-Total of Expenses:			\$ 1,142.82

TOTAL EXPENSES **\$ 14,607.27**

TOTAL FEES AND EXPENSES **\$ 498,637.77**